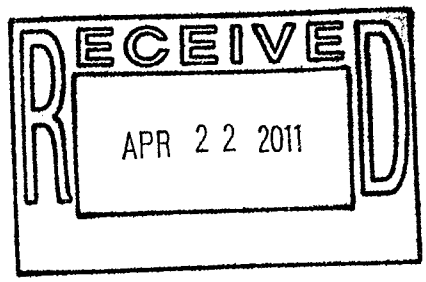
Michigan Refining Division

Marathon Petroleum Company LP

1300 South Fort Street
Detroit, MI 48217
Telephone 313/843-9100

FEDERAL EXPRESS

April 21, 2011



Ms. Teresa Seidel
MDNRE – Air Quality Division
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

RE: First Quarter 2011 Leak Detection and Repair, Wastewater VOC, and Benzene Waste NESHAP Certification and Compliance Report

Dear Ms. Seidel:

This report is being submitted by the Michigan Refining Division of Marathon Petroleum Company LP (MPC) to fulfill the requirements of:

- The fugitive and wastewater VOC emissions monitoring program for the first quarter of 2011. This report is required by Michigan Air Rule 622, U.S. EPA's New Source Performance Standards (NSPS), and the National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries. In addition, this report contains information required by Paragraph 20Oiic of the First Modification to the November 2005 First Revised Consent Decree (CD), United States of America et. al. v. Marathon Petroleum Company LP (MPC) (Civil Action No. 4:01CV-40119-PVG), lodged February 7, 2008 and entered on March 31, 2008.
- The Benzene Waste NESHAPS Subpart FF Certification and Compliance report for the first quarter of 2011. This report is required by 40 CFR 61 Subpart FF and Paragraph 18.P.ii.b of the Consent Decree.

The attached tables include information necessary for compliance with these requirements.

Table 1 lists MPC process units (NSPS VV Section 60.487 (c)(1)) and summarizes the process unit shutdowns that occurred during this quarter (NSPS VV Section 60.487 (c)(3)). Table 1 also includes the approximate number of components present in each unit at the beginning and ending of the reporting period (NSPS VV Section 60.487(c)(4)).

Table 2 lists the components found leaking and an exceedance summary for various pieces of control equipment or treatment processes during this quarter and the dates of repair (NSPS VV Section 60.487(c)(2) and 40 CFR 61.357(d)(7)).

Table 3 lists leaking components on delay of repair (NSPS VV Section 60.487(c)(2)). This information is also required by Paragraph 20.O.ii.c.2.f of the CD.

Table 4 includes information satisfying NSPS Subpart QQQ (Section 60.698(c)) requirements.

This table summarizes drain and junction box inspections that identified seals with low water level or other problems that could result in VOC emissions. In addition, subsequent corrective actions and/or repairs are identified. All required inspections for the QQQ standards have been completed as required.

Table 5 presents measures that MPC took to satisfy Paragraphs 20.O.ii.c.1 and 18.P.ii.b of the CD.

Table 6 lists specific monitoring information as required per Paragraph 20.O.ii.c.2.a–e of the CD.

Table 7 contains the certification that all of the required inspections have been carried out in accordance with the requirements of 40 CFR 61.357(d)(6).

Table 8 contains the exceedance summary for various pieces of control equipment or treatment processes as required in 40 CFR 61.357(d)(7) and 4 0CFR 60.692-5(e)(5).

Table 9 contains the End of Line calculation as required per Paragraph 18.K.iii and 18.P.ii.b of the CD. The refinery received written approval of the End of Line Sampling Plan on March 8, 2010.

Table 10 includes information satisfying Benzene Waste NESHAP Subpart FF (Section 61.357(d)(8)) requirements.

This table summarizes all inspections required by 40 CFR 61.342 through 61.354 during which detectable emissions are measured or a problem that could result in benzene emissions is identified. Additionally, subsequent corrective actions and/or repairs are identified.

Please contact Ms. Kristen Schnipke (313) 297-4750 or Mr. Greg Shay (313) 297-6115 if you have any questions concerning this submittal.

Sincerely,

Marathon Petroleum Company LP

By: MPC Investment LLC, General Partner

Mr. C.T. Case, Deputy Assistant Secretary

Attachments

cc: (2) U.S. EPA, Director of Regulatory Enforcement c/o Matrix Environmental and Geotechnical – *Federal Express*
(2) Air and Radiation Division, U.S. EPA Region 5 –*Federal Express*
(2) Office of Regional Counsel, U.S. EPA Region 5 – *Federal Express*

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name: Marathon Petroleum Company LP County: Wayne

Source Address: 1300 South Fort Street City: Detroit

AQD Source ID (SRN): A9831 ROP No.: 199700013c ROP Section No.: 01

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 1/1/2011 To 3/31/2011

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

First Quarter Leak Detection and Repair, Benzene Waste NESHAP and QQQ Report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

C.T. Case	MPC Investment LLC, its General Partner Deputy Assistant Secretary	(313)843-9100
Name of Responsible Official (print or type)	Title	Phone Number

C.T. Case

Signature of Responsible Official

4-15-11

Date

* Photocopy this form as needed.

EQP 5736 (Rev 2-10)

Table 1
Component Summary - First Quarter 2011
Michigan Refining Division

Complex	Unit	Description	Approximate Number of Components						Dates of Shutdown
			Pumps		Valves		Compressors		
			12/31/2011	3/31/2011	12/31/2011	3/31/2011	12/31/2011	3/31/2011	
1	4	Vacuum Unit	5	5	465	455	2	2	
	5	Crude Unit	23	23	1978	2,036	0	0	
	29	Wastewater Plant	11	11	564	564	0	0	
2	7	Distillate Hydrotreater Unit	16	16	1256	1,225	3	3	
	8	Gas Oil Hydrotreater Unit	5	5	1479	1,542	2	2	
	9	Alkylation Unit	26	26	1890	1,935	1	1	12/30-1/11/11
3	11	Fluid Catalytic Cracking Unit	6	6	479	495	0	0	
	13	Propylene Unit	8	8	661	693	3	3	
	12 21	Gas Con/SATS Depropanizer/Treaters	28	28	1844	1,847	2	2	
4	14	Continuous Catalytic Reformer Unit	14	14	1982	1,991	2	2	
	16	Naphtha Hydrotreater Unit	17	17	1017	1,716	0	0	
	19	Kerosene Hydrotreater Unit	7	7	536	536	2	2	
5	1	Crude Tank Farm	20	20	668	685	0	0	
	2	LPG Tank Farm	16	16	1692	1,728	0	0	
	3/4	CP/Melvindale Tank Farms	23	23	1422	1,422	0	0	
		Light Products Terminal	8	8	636	636	0	0	

Table 2
Leakers Detected During First Quarter 2011
Michigan Refining Division

Month	Complex	Unit	VOC Tag I.D.	Component Type	Date Leak Detected	Date of Repair*

SEE ATTACHED TABLE

*R/D = Repair Delay S/D = Shutdown Required

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 01

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
34006	PUMP	0.000	W of carbon can station# 11in the API	Normal	NSPS-VV-PUMP-LL 03/28/2011	10000.0000
5-00043	PUMP/ CENTRIF	0.000	22P126 TK36 XFER PUMP-01	Normal	CONSENT-MD-PUMP-LL 01/04/2011	44400.0000

Unit 01 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	2	2	0	2	0
Total Valves	0	0	0	0	0
Total Pumps	2	2	0	2	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 02

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
12470	VALVE	0.750	TOP/TOP BALLCHK TK 89	Normal	CONSENT-MD-VALVE	
					03/08/2011	428400.0000
					03/08/2011	160100.0000
31011	VALVE	3.000	TANK 83 QV S END BTM DRAIN	Normal	CONSENT-MD-VALVE	
					03/08/2011	44700.0000
					03/09/2011	40800.0000
5-01291	VALVE/ ORBIT	4.000	T81 TOP ORBIT	Normal	NESHAPS-FF-VALVE	
					03/07/2011	29900.0000
5-01376	VALVE	6.000	22-P-89 ORBIT LPG	Normal	CONSENT-MD-VALVE	
					01/14/2011	12400.0000
5-01652	VALVE/ ORBIT	3.000	22-P-42 C=3 PUMP LPG-02-02-02-02-02-02	Normal	CONSENT-MD-VALVE-CNTRL	
					03/07/2011	40400.0000
					03/07/2011	74400.0000
5-01867	VALVE	2.000	TOP 95 C=3 LPG	Normal	CONSENT-MD-VALVE	
					03/08/2011	46600.0000
23957	PUMP/ CENTRIF	0.000	22P36 - TK89 - MTBE CHARGE-02	Normal	CONSENT-MD-PUMP-LL	
					03/01/2011	13100.0000
					03/01/2011	42300.0000
5-00024	PUMP/ CENTRIF	0.000	22P89 (TK 87) N-C4 TO WOODHAVEN-02	Normal	CONSENT-MD-PUMP-LL	
					01/03/2011	10500.0000
					01/03/2011	12000.0000
					03/02/2011	80000.0000

Unit 02 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	Visual	Method 21	Visual
Total in Unit	8	8	0	14	0
Total Valves	6	6	0	9	0
Total Pumps	2	2	0	5	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 04

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
1-01172	VALVE	0.750	W SDE 4H1 @ FUEL GAS LNE BRNR# 12	Normal	NSPS-GGGA-VALVE	
					01/07/2011	1274.0000
					01/07/2011	1152.0000
20146	VALVE	0.500	E SDE VAC UNIT @ 5V49 FUEL GAS KO DRM TOP PLTFR U5	Normal	NSPS-GGGA-VALVE	
					01/07/2011	873.0000
					01/07/2011	883.0000
					02/18/2011	2779.0000
					02/18/2011	949.0000
32422	VALVE/ NEEDLE	0.500	4V37 E BTM NV @ FLOAT CHAMBER	Normal	NSPS-GGGA-VALVE	
					02/18/2011	1397.0000
					02/18/2011	28700.0000

Unit 04 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	3	3	0	8	0
Total Valves	3	3	0	8	0
Total Pumps	0	0	0	0	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

No records were available for this report using the parameters specified

ENVIRONMENTAL INC.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 2000 PPM

Unit 4

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
		0.000				

Unit Summary

	Components Inspected		Monitoring Event Count	
	Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	0	0	0	0
Total Valves	0	0	0	0
Total Pumps	0	0	0	0
Total Compressors	0	0	0	0
Total Relief Valves	0	0	0	0
Total Connectors	0	0	0	0
Total Agitators	0	0	0	0
Total Other Equipment	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 05

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
33411	VALVE/ NEEDLE	0.250	5V5 LVL 1 NV	Normal	NSPS-VV-VALVE	
					03/31/2011	12700.0000
					03/31/2011	39000.0000

Unit 05 Summary

	Components Inspected		Monitoring Event Count	
	Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	1	0	2	0
Total Valves	1	0	2	0
Total Pumps	0	0	0	0
Total Compressors	0	0	0	0
Total Relief Valves	0	0	0	0
Total Connectors	0	0	0	0
Total Agitators	0	0	0	0
Total Other Equipment	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 09

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
21154	VALVE	0.000	6/5 OFF DISCH LINE	Normal	CONSENT-MD-VALVE	
					01/13/2011	11300.0000
26140	VALVE/ GATE	3.000	9P55	Normal	NSPS-VV-VALVE	
					01/13/2011	12800.0000
30987	VALVE	0.000	6/3 SNUFFING BOX VENT LINE 9P3B	Normal	CONSENT-MD-VALVE	
					01/13/2011	26100.0000
					01/13/2011	210000.0000
34306	VALVE	0.750	L2/5 W OF 9V1	Normal	CONSENT-MD-VALVE	
					01/14/2011	13100.0000
					01/14/2011	33200.0000
17873	PUMP	0.000	6/0 9P3B	Normal	CONSENT-MD-PUMP-LL	
					03/08/2011	11900.0000
18758	PUMP	0.750	9P39A	Normal	CONSENT-MD-PUMP-LL	
					01/19/2011	45000.0000
					01/19/2011	43600.0000
2-01124	PUMP/ CENTRIF	0.000	9P2A DEPROP REFLUX-09-09	Normal	CONSENT-MD-PUMP-LL	
					02/01/2011	12500.0000
					02/01/2011	13500.0000

Unit 09 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	Visual	Method 21	Visual
Total in Unit	7	7	0	11	0
Total Valves	4	4	0	6	0
Total Pumps	3	3	0	5	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 11

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
3-00263	PUMP	0.000	11P41	Normal	CONSENT-MD-PUMP-LL 03/22/2011	10000.0000

Unit 11 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	1	1	0	1	0
Total Valves	0	0	0	0	0
Total Pumps	1	1	0	1	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 12-21

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
13684	VALVE	0.750	21V42 LVL1 LVL CLM	Normal	CONSENT-MD-VALVE	
					02/09/2011	26200.0000
14506	VALVE	0.500	12P143B DISCH - MID BV @FT	Normal	CONSENT-MD-VALVE	
					03/30/2011	22800.0000
29238	VALVE	2.000	12V40 1/3 N SD	Normal	CONSENT-MD-VALVE	
					02/14/2011	279900.0000
					02/14/2011	79900.0000
30406	VALVE/ CTRL	0.000	PRESSURE CV/FUEL GAS TO 21V9 TOP PV0209	Normal	CONSENT-MD-VALVE-CNTRL	
					02/09/2011	14600.0000
					02/09/2011	55100.0000
32982	VALVE	0.750	12V26 4/6 E SIDE SG	Normal	CONSENT-MD-VALVE	
					02/14/2011	20200.0000
					02/14/2011	29700.0000
					03/31/2011	72500.0000
					03/31/2011	15100.0000
33419	VALVE/ NEEDLE	0.250	12FC0285 E OF 12P137	Normal	NSPS-VV-VALVE	
					02/11/2011	21900.0000
					02/11/2011	53400.0000
34205	VALVE	0.750	12V49 LVL1	Normal	CONSENT-MD-VALVE	
					02/18/2011	21900.0000
					02/18/2011	19700.0000
3-00280	PUMP	0.750	PUMP 12P120	Normal	CONSENT-MD-PUMP-LL	
					01/05/2011	14800.0000
					01/05/2011	10100.0000
33267	PUMP	0.750	12P138 PUMP SMFT SEAL	Normal	CONSENT-MD-PUMP-LL	
					03/01/2011	11800.0000

Unit 12-21 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	Visual	Method 21	Visual
Total in Unit	9	9	0	17	0
Total Valves	7	7	0	14	0
Total Pumps	2	2	0	3	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 13

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
3-00285	PUMP	0.000	5' E 13V14 @ 13P261	Normal	CONSENT-MD-PUMP-LL	
					01/05/2011	82100.0000
					01/05/2011	41000.0000
3-00286	PUMP	0.000	5' E 13V14 @13P260	Normal	CONSENT-MD-PUMP-LL	
					01/05/2011	51800.0000
					01/05/2011	48000.0000
					03/01/2011	41100.0000
					03/01/2011	58300.0000
3-00288	PUMP	0.000	13P295	Normal	CONSENT-MD-PUMP-LL	
					01/18/2011	100000.0000
3-00289	PUMP	0.000	13P270	Normal	CONSENT-MD-PUMP-LL	
					01/05/2011	41000.0000
					01/05/2011	64100.0000
3-00290	PUMP	0.000	13P266	Normal	CONSENT-MD-PUMP-LL	
					02/01/2011	18400.0000

Unit 13 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	Visual	Method 21	Visual
Total in Unit	5	5	0	10	0
Total Valves	0	0	0	0	0
Total Pumps	5	5	0	10	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 14

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
28071	VALVE/ CTRL	0.000	PRIMARY LIFT GAS 2ND LVL CCR 14XV0994	Normal	NSPS-VV-VALVE 01/05/2011	10400.0000

Unit 14 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	1	1	0	1	0
Total Valves	1	1	0	1	0
Total Pumps	0	0	0	0	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 16

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
18884	VALVE/ BLOCK	0.750	EAST OF BW BOILER FUEL GAS 0.75" BLOCK VLV TO PRESSURE GAUGE	Normal	NSPS-GGGA-VALVE	
					01/12/2011	690.0000
18890	VALVE/ CTRL	8.000	EAST OF BW BOILER FUEL GAS 8" CONTROL VALVE-16-1	Normal	NSPS-GGGA-VALVE	
					01/12/2011	4708.0000
					01/12/2011	763.0000
18897	VALVE/ BLEEDER	0.500	20FT EAST OF BW BOILER FUEL GAS	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1394.0000
					03/14/2011	1601.0000
18901	VALVE/ CTRL	8.000	EAST OF BW BOILER FUEL GAS CV FOR MAIN BURNER 8" 27FC0035	Normal	NSPS-GGGA-VALVE	
					02/17/2011	604.0000
					02/17/2011	587.0000
					03/14/2011	11200.0000
					03/14/2011	15100.0000
19318	VALVE	2.000	S SDE 16E10C	Normal	NSPS-GGGA-VALVE	
					03/14/2011	557.0000
					03/14/2011	537.0000
31693	VALVE/ CTRL	4.000	LVL 2 S OF 16E19C FINFAN @ LOOP CV 16FC0708	Normal	NSPS-GGGA-VALVE	
					03/14/2011	961.0000
					03/15/2011	677.0000
31764	VALVE/ BALL	0.250	16P302A DISCHARGE	Normal	NSPS-GGGA-VALVE	
					03/14/2011	651.0000
31789	VALVE/ GATE	1.000	16P302B DISCHARGE	Normal	NSPS-GGGA-VALVE	
					02/17/2011	1906.0000
					02/17/2011	1817.0000
31859	VALVE	0.500	SE PLAT 16V4 AT DP CELL	Normal	NSPS-GGGA-VALVE	
					03/11/2011	618.0000
31948	VALVE/ NEEDLE	0.250	16P303A DISCHARGE	Normal	NSPS-GGGA-VALVE	
					01/12/2011	671.0000
					03/14/2011	2312.0000
					03/14/2011	1536.0000
31975	VALVE/ NEEDLE	0.250	16P303B DISCHARGE	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1416.0000
					03/14/2011	3759.0000
31979	VALVE/ GATE	1.000	16P303B DISCHARGE	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1289.0000
					03/14/2011	3191.0000

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 16

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
31980	VALVE/ GATE	1.000	16P303B DISCHARGE	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1253.0000
					03/14/2011	2387.0000
31986	VALVE/ BALL	0.250	16P303B S SIDE SAMP STAT	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1228.0000
					03/14/2011	2183.0000
32033	VALVE/ NEEDLE	0.250	16V13 LVL 7	Normal	NSPS-GGGA-VALVE	
					03/14/2011	3412.0000
					03/14/2011	2172.0000
32046	VALVE/ NEEDLE	0.250	16V13 TOP LVL @ GAUGE	Normal	NSPS-GGGA-VALVE	
					03/14/2011	6669.0000
					03/14/2011	47200.0000
32244	VALVE/ NEEDLE	0.250	N OF 16V2 GRND LVL @ LOOP	Normal	NSPS-GGGA-VALVE	
					01/11/2011	565.0000
					01/11/2011	652.0000
32249	VALVE/ GATE	0.750	16V2 LVL @ SG	Normal	NSPS-GGGA-VALVE	
					01/11/2011	771.0000
					01/11/2011	682.0000
32250	VALVE/ GATE	1.000	E PLT AT 16V2	Normal	NSPS-GGGA-VALVE	
					01/11/2011	2109.0000
					01/11/2011	1738.0000
					03/14/2011	3774.0000
					03/14/2011	3866.0000
32253	VALVE/ GATE	10.000	PIPES W OF 16V2 LVL 1 IN Piperack	Normal	NSPS-GGGA-VALVE	
					01/12/2011	760.0000
32907	VALVE/ CTRL	4.000	W SIDE 16V3 CTRL LOOP CV 16FC0678	Normal	NSPS-GGGA-VALVE	
					02/17/2011	1005.0000
					02/17/2011	739.0000
					03/10/2011	1193.0000
					03/10/2011	1165.0000
32923	VALVE/ CTRL	4.000	W SIDE 16V4 CTRL LOOP	Normal	NSPS-GGGA-VALVE	
					02/17/2011	691.0000
					02/17/2011	981.0000
					03/10/2011	757.0000
					03/10/2011	909.0000
33243	VALVE/ NEEDLE	0.500	EAST OF BW BOILER FUEL GAS 0.5" NEEDLE VALVE BYPASS	Normal	NSPS-GGGA-VALVE	
					02/17/2011	2017.0000
					02/17/2011	1327.0000
					03/14/2011	1179.0000
					03/14/2011	64100.0000
					03/17/2011	6870.0000
4-01325	VALVE	0.750	SUCT LINE 16P98	Normal	NSPS-GGGA-VALVE	
					01/11/2011	991.0000

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 16

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
4-01325	VALVE	0.750	SUCT LINE 16P98	Normal	NSPS-GGGA-VALVE	
					01/11/2011	1020.0000
4-01479	VALVE	0.750	NW SDE 16V6 CHG HTR FUEL	Normal	NSPS-GGGA-VALVE	
					01/11/2011	922.0000
					02/17/2011	1008.0000
4-01480	VALVE	0.750	NE SDE 16V6 CHG HTR FUEL	Normal	NSPS-GGGA-VALVE	
					01/11/2011	1085.0000
					01/11/2011	1666.0000
4-01513	VALVE/ CTRL	0.000	S SDE E OF NHT REBOILER CV 16FC0610	Normal	NSPS-GGGA-VALVE	
					01/11/2011	601.0000
					02/17/2011	1088.0000
					02/17/2011	1805.0000
					03/11/2011	586.0000
					03/11/2011	599.0000
4-01521	VALVE/ CTRL	0.000	S SDE ON CL E OF NHT REBOILER CV 16FC0611	Normal	NSPS-GGGA-VALVE	
					01/11/2011	580.0000
					02/17/2011	1567.0000
					02/17/2011	1673.0000
					03/11/2011	559.0000
					03/11/2011	594.0000
4-01531	VALVE/ CTRL	0.000	S SDE CL E OF NHT REBOILER CV 16FC0612	Normal	NSPS-GGGA-VALVE	
					02/17/2011	940.0000
					02/17/2011	1013.0000
					03/11/2011	825.0000
					03/11/2011	635.0000
4-01541	VALVE	0.000	S SDE NE OF REBOILER ON CL 16PC0613 CV 16FC0613	Normal	NSPS-GGGA-VALVE	
					02/17/2011	650.0000
					02/17/2011	740.0000
					03/11/2011	651.0000
					03/11/2011	637.0000
4-01554	VALVE	0.750	PASS 4 E OF NHT REBOILER DP CELL	Normal	NSPS-GGGA-VALVE	
					01/11/2011	526.0000
					01/11/2011	825.0000
4-01761	VALVE	4.000	S SDE FIN FAN DECK	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1332.0000
					03/14/2011	1706.0000
4-01793	VALVE	1.000	E PLT AT 16V2	Normal	NSPS-GGGA-VALVE	
					03/14/2011	1100.0000
					03/14/2011	1178.0000
40817	VALVE	0.750	ON CL NHT RSB H R FUEL STATION	Normal	NSPS-GGGA-VALVE	
					01/13/2011	575.0000

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 16

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading

Unit 16 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	34	34	0	85	0
Total Valves	34	34	0	85	0
Total Pumps	0	0	0	0	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 2000 PPM

Unit 16

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
27858	PUMP	0.000	PUMP P299A NHT REFLUX SE 16V4	Normal	NSPS-GGGA-PUMP-LL	
					01/05/2011	4371.0000
					01/05/2011	3496.0000
					03/01/2011	2524.0000
					03/01/2011	7098.0000

Unit 16 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	1	1	0	4	0
Total Valves	0	0	0	0	0
Total Pumps	1	1	0	4	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

No records were available for this report using the parameters specified

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 500 PPM

Unit 29 **Reporting Period 01/01/2011 - 03/31/2011**

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
		0.000				

Unit Summary

	Components Inspected		Monitoring Event Count	
	Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	0	0	0	0
Total Valves	0	0	0	0
Total Pumps	0	0	0	0
Total Compressors	0	0	0	0
Total Relief Valves	0	0	0	0
Total Connectors	0	0	0	0
Total Agitators	0	0	0	0
Total Other Equipment	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

No records were available for this report using the parameters specified

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 2000 PPM

Unit 29

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
		0.000				

Unit Summary

	Components Inspected		Monitoring Event Count	
	Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	0	0	0	0
Total Valves	0	0	0	0
Total Pumps	0	0	0	0
Total Compressors	0	0	0	0
Total Relief Valves	0	0	0	0
Total Connectors	0	0	0	0
Total Agitators	0	0	0	0
Total Other Equipment	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/11/2011

EQUIPMENT INSPECTION REPORT

This report only shows readings that were over 10000 PPM

Unit 34

Reporting Period 01/01/2011 - 03/31/2011

Tag Number	Part / Type	Size	Location	Catgegory	Monitor Date	PPM Reading
5-00959	VALVE	2.000	10' E OF TK 101 ON CATWALK AT 22P305 DISCH	Normal	CONSENT-MD-VALVE 03/21/2011	10000.0000

Unit 34 Summary

	Components In Unit	Components Inspected		Monitoring Event Count	
		Method 21	**Visual**	**Method 21**	**Visual**
Total in Unit	1	1	0	1	0
Total Valves	1	1	0	1	0
Total Pumps	0	0	0	0	0
Total Compressors	0	0	0	0	0
Total Relief Valves	0	0	0	0	0
Total Connectors	0	0	0	0	0
Total Agitators	0	0	0	0	0
Total Other Equipment	0	0	0	0	0

Total Out of Service 0

Note: Report includes only those components that were active on the ending report date. This EXCLUDES any component that was active during this period but deleted BEFORE the end of this period.

Table 3
Regulatory Leakers Requiring Delay of Repair - First Quarter 2011
Michigan Refining Division

Complex	Unit	VOC Tag I.D.	Comp type	Date leak first detected	Component Description	Reason for delay of repair	Date Placed on delay of repair	Date of Actual/Anticipated Repair
2	9	9C1	Compressor	11/12/2009	09C1 Seal leaking on East Side of housing	Requires unit shutdown	11/23/2009	10/31/2012
2	9	17873	Pump	3/8/2011	9P3B	Back up pump 9P3A OOS	3/22/2011	4/29/2011
3	11	3-00263	Pump	3/22/2011	11P41	Out of VOC Service	4/6/2011	4/7/2011
4	16	33243	Valve	3/14/2011	Control Valve Main Fuel Gas	Requires unit shutdown	3/25/2011	7/1/2011
4	16	25599	Valve	11/20/2009	Bonnet of gate valve leaking control loop SE of 16V9	Isolated From VOC Service	12/18/2009	10/31/2012
4	16	18901	Valve	12/8/2010	E. of BW Boiler CV 27FC0035	Requires unit shutdown	12/27/2010	3/25/2011

☐ Repaired

Table 4
Wastewater System Monitoring - First Quarter 2011
Michigan Refining Division

Complex	Unit	Tag ID	Date	Service/Description	First Attempt	Recommended Fix	Final repair	Final Repair Date
1	5	773	12/9/2010	Catch basin Northeast of Desalter by Elec Boxes	Work Order Written	Engineer Optimum Design	Ongoing	Ongoing
1	29	N/A	12/9/2010	Vent Pipe Stormwater Sump	Work Order Written	Engineer Optimum Design	Ongoing	Ongoing
5	2	30363	1/4/2011	Drain S Side of Tank 100 Water Draw	Email	New Latch	Installed New Latch	1/19/2011
1	5	050	1/3/2011	Drain W of 5P9B	Email	Install Plug	Plug Installed	1/18/2011
1	5	059	1/3/2011	Drain W of 5P4A	Install Plug	Install Plug	Plug Installed	1/3/2011
2	8	136	1/4/2011	Drain 20 ft NW of 8P1A 5 ft from Fire Hydrant	Install Plug	Install Plug	Plug Installed	1/4/2011
3	12-21	339	1/5/2011	CB W of 12V41 in Roadway	Add Water	Add Water	Water Added	1/12/2011
4	14	709	1/5/2011	Drain at Base of 14V6 SR Deb	Install Plug	Install Plug	Plug Installed	1/5/2011
4	16	494	1/5/2011	Drain at 27V21 S Side	Install Plug	Install Plug	Plug Installed	1/5/2011
2	8	136	1/10/2011	Drain 20 ft NW of 8P1A 5 ft from Fire Hydrant	Install Plug	Install Plug	Plug Installed	1/10/2011
4	14	709	1/12/2011	Drain at Base of 14V6 SR Deb	Install Plug	Install Plug	Plug Installed	1/12/2011
4	14	672	1/12/2011	Drain Near W End of 14P1B SR BFW Elec	Install Plug	Install Plug	Plug Installed	1/12/2011
4	17	410	1/12/2011	Drain W of 17P46A SR Chg Pump	Install Plug	Install Plug	Plug Installed	1/13/2011
2	8	359	1/18/2011	Drain N End of 8P4A	Add Water	Add Water	Water Added	1/25/2011
2	8	169	1/18/2011	Drain N End of 8P4B	Add Water	Add Water	Water Added	1/25/2011
4	14	192	1/18/2011	CB E of 14H8 ignition panel	Add Water	Add Water	Water Added	1/27/2011
4	14	205	1/18/2011	Drain SE of SR Reflux CV	Install Plug	Install Plug	Plug Installed	1/27/2011
1	4	683	1/27/2011	Drain SE of 4V8	Install Plug	Install Plug	Plug Installed	2/9/2011
1	5	057	1/27/2011	Drain SE of 5P5A	Install Plug	Install Plug	Plug Installed	2/3/2011
3	12-21	338	1/27/2011	CB E of 12E39	Add Water	Add Water	Water Added	2/4/2011
3	12-21	339	1/27/2011	CB W of 12V41 in Roadway	Add Water	Add Water	Water Added	2/4/2011
4	14	222	1/27/2011	CB at 14C1 SR Rec Comp	Add Water	Add Water	Water Added	2/11/2011
5	1	30363	2/1/2011	Drain S Side of Tank 100 Water Draw	Add Water	New Latch	Installed New Latch	2/11/2011
2	43	609	2/1/2011	Drain S End of 43V104	Install Plug	Install Plug	Plug Installed	2/1/2011
2	7	629	2/10/2011	Drain at 7V67	Install Plug	Install Plug	Plug Installed	2/10/2011
1	5	063	2/16/2011	Drain E of 5P16B	Install Plug	Install Plug	Plug Installed	2/16/2011
1	5	754	2/16/2011	Funnel Drain W of 5H1	Add Water	Add Water	Water Added	2/21/2011
4	14	709	2/21/2011	Drain at Base of 14V6 SR DEB	Install Plug	Install Plug	Plug Installed	3/11/2011
4	16	494	2/23/2011	Drain at 27V21 S Side	Install Plug	Install Plug	Plug Installed	3/1/2011

Table 4
Wastewater System Monitoring - First Quarter 2011
Michigan Refining Division

Complex	Unit	Tag ID	Date	Service/Description	First Attempt	Recommended Fix	Final repair	Final Repair Date
4	16	314	2/23/2011	CB SW 27BR8 Near Road	Add Water	Add Water	Water Added	3/11/2011
2	8	144	3/2/2011	Drain 7 ft N of 8E32A/B	Add Water	Add Water	Water Added	3/8/2011
2	8	162	3/2/2011	Drain SE Side of 8V5	Add Water	Add Water	Water Added	3/8/2011
2	9	560	3/2/2011	Drain N Side of 9V10	Add Water	Add Water	Water Added	3/8/2011
3	11	596	3/1/2011	Drain at SE Corner of FCC Charge Htr	Install Plug	Install Plug	Plug Installed	3/25/2011
4	16	323	3/1/2011	Drain SE Side of 27SS1	Install Plug	Install Plug	Plug Installed	3/11/2011
4	19	260	3/1/2011	Drain at 19P3B KHT Reflux Pump	Add Water	Add Water	Water Added	3/18/2011
1	4	681	3/10/2011	Drain 6 ft SE of 4P4A	Install Plug	Install Plug	Plug Installed	3/22/2011
1	4	683	3/10/2011	Drain SE of 4V8	Install Plug	Install Plug	Plug Installed	3/22/2011
1	5	047	3/10/2011	Drain W of 5P7B	Add Water	Add Water	Water Added	3/16/2011
1	5	189	3/10/2011	Drain S Side of 5P60B	Install Plug	Install Plug	Plug Installed	3/18/2011
1	5	651	3/10/2011	Drain N of 5P78B	Install Plug	Install Plug	Plug Installed	3/16/2011
1	5	652	3/10/2011	Drain N of 5P78A	Install Plug	Install Plug	Plug Installed	3/16/2011
1	5	711	3/10/2011	CB 15 ft W Emergency Shower	Add Water	Add Water	Water Added	3/22/2011
1	5	754	3/10/2011	Drain Funnel W of 5H1	Add Water	Add Water	Water Added	3/22/2011
3	12-21	339	3/11/2011	CB W of 12V41 in Roadway	Add Water	Add Water	Water Added	3/18/2011
4	14	672	3/11/2011	Drain Near W End of 14P1B SR BFW Elec	Install Plug	Install Plug	Plug Installed	3/18/2011
4	19	260	3/11/2011	Drain at 19P3B KHT Reflux Pump	Add Water	Add Water	Water Added	3/18/2011
4	19	261	3/11/2011	Drain at 19P3A KHT Reflux Pump	Add Water	Add Water	Water Added	3/18/2011
4	19	262	3/11/2011	Drain at 19P102 Water Inj Pump	Install Plug	Install Plug	Plug Installed	3/18/2011
1	5	060	3/16/2011	Drain W of 5P4B	Install Plug	Install Plug	Plug Installed	3/22/2011
2	8	144	3/15/2011	Drain 7 ft N of 8E32A/B	Add Water	Add Water	Water Added	3/24/2011
2	43	607	3/15/2011	Drain S End of 43V103	Install Plug	Install Plug	Plug Installed	3/24/2011

Table 5
NSR Consent Decree Information Paragraphs 20B and 18P - First Quarter 2011
Michigan Refining Division

Measures that MPC took during the 1st Quarter 2011 to satisfy the provisions of Paragraph 20B and 18P(ii)(b) of the NSR Consent Decree:

Subparagraph	Requirement	Measures taken
20Bi	Training for personnel newly-assigned to LDAR	Greg Shay completed training in July 2009 for LDAR.
20Bii	Annual training for regular LDAR personnel	Regular LDAR work is contracted through Emissions Monitoring Service, Inc (EMSI Inc.) and Seal-Tech. EMSI and Seal-tech trains all personnel, training records are kept on-site.
20Biii	Training for Ops/Maint personnel	Refinery employees are required to complete a yearly Environmental Awareness CBT (Computer Based Training) module. This module, includes training information on the LDAR Program, was initiated on March 12, 2002. Additionally, contractors are required to attend a safety orientation on a yearly basis which includes information on the LDAR Program.
20Ci	Third Party Audit	Sage Environmental completed an audit of the MRD LDAR program March 2011 as specified in 20Ci.
18P(ii)(b)	Laboratory Audits	The Detroit Refinery now has the ability to use RAD, ESC Labs of Nashville, TN, and Bureau Veritas of Livonia, MI to run all BWON samples. The Detroit Refinery began using ESC Labs of Nashville, TN on June 22, 2010.
18P(ii)(b)	Training	Affected Refinery employees are required to complete a yearly Benzene Sampling CBT (Computer Based Training) module. This module, includes training information on the Benzene NESHAP Program, was initiated on August 2002.
18P(ii)(b)	EOL Sampling Results	The EOL Sampling program was approved on March 8, 2010 for the Detroit Refinery. See Table 9 for EOL calculations.

Table 6
NSR Consent Decree Information Paragraph 20Oiic(2) - First Quarter 2011
Michigan Refining Division

Complex	Unit	Description	Month monitored	# valves monitored	# pumps monitored	# compressors monitored	GGG # components leaking/quarter	GGGa # components leaking/quarter	# DTM components
1	4	Vacuum Unit	Jan-11 March-11	428	5	2	na	3	3
	5	Crude Unit	Mar-11	2,022	23	0	1	na	18
	29	Wastewater Plant	Jan-11	564	11	0	na	0	0
2	7	Distillate Hydrotreater Unit	Mar-11	1,202	16	3	0	na	21
	8	Gas Oil Hydrotreater Unit	Feb.-11	1,511	5	2	0	na	27
	9	Alkylation Unit	Jan-11	1,890	26	1	7	na	32
3	11	Fluid Catalytic Cracking Unit	Mar-11	457	6	0	1	na	4
	12/21	Gas Con/SATS Depropanizer	Feb.-11	1,824	28	2	9	na	20
	13	Propylene Unit	Mar-11	696	8	3	5	na	4
4	14	Continuous Catalytic Reforming Unit	Jan-11	1,960	14	2	1	na	31
	16	Naphtha Hydrotreater Unit	Jan-11 March-11	1,380	17	0	na	36	30
	19	Kerosene Hydrotreater Unit	Jan-11	524	7	1	1	na	12
5	1	Crude Tank Farm	Feb.-11	658	20	0	2	na	7
	2	LPG Tank Farm	Mar-11	1,671	16	0	8	na	45
	3/4	CP/Melvindale Tank Farms	Jan-11	1,388	23	0	1	na	34
		Light Product Terminal	Jan-11	634	8	0	0	na	0

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Revised stream/equipment name/status	Required monitoring/inspections	Inspection Status	Monitoring/ inspection rule	Equipment Classification	Note No.	Visual	Method 21*
SR Platformer Aromatics Sump (aka CP Sump)	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from the CP Sump to the CP Flare Secondary Knockout Drum (25V2)	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
CP Sump Line from 14P10 to Sour Water Collection Tank (11V25) and Low Pressure Receiver (11V4)	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
CP Flare Knockout Drums - Primary (25V1) and Secondary (25V2)	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from CP Flare Knockout Drums to the Slop Tanks 23/508 or the Low Pressure Receiver (11V4)	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Alky Spent Caustic Holding Tank (9V31) to Alky Flare Knockout Drum (9V38)	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for		61.349(f)			X	
Piping from Spent Caustic Drum (21V47) to CP Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from Relief Valve of Merox System to CP Flare	Do not need to monitor or inspect this piping since it's now going to the flare system. Point of generation is the Flare Knockout Drum discharge.	--	N/A	--			
Piping from Disulfide Separator (21V33 or #3 Merox) to Slop Tanks 23/508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Tanks 508 and 23	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Piping from Tank 507 to Slop Tanks 508 and 23	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Gravity Drum near Tank 507 (gravity drum near Tank 59 is currently out of service)	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for		61.343(c)			X	
Tanks 29T40 and 29T41 (Permitted as QQQ tanks with external floating roofs)	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from API separator to Tanks 29T40/41	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Tanks 29T40/41 to Slop Tanks 23 and 508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Unifiner, Alkylation, GOHT, and Crude Flare Knock-Out Drums to Tanks 23 and 508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Vacuum Trucks	The cover and all openings (e.g., bungs, hatchs, and sampling ports) must be monitored initially and annually for NDE.	Conducted 2nd Quarter 2010	61.345(a)(1)(i)	Containers			X
	Each cover and all openings shall be visually inspected initially and quarterly to ensure that they are closed and gasketed properly.	Completed	61.345(b)	Containers		X	
Piping from NHT Particulate Filter Relief to Refinery Slop System	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Disulfide Off-Gas Knockout Drum (12V36) to Refinery Slop System	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Piping from the West Plant Slop System to Slop Tanks 23/508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping associated with the carbon canister stations	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Carbon Canisters	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Water Draw Covers This includes tanks in the Crude tank farm (6, 36, 39, 40, 41, 45, 46, 47, 48, 49, 53, 61, 72), CP Tank Farm (21, 57), and Melvindale Tank Farm (102, 103, 104, 105, 106, 107, etc).	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
CP Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from Tank 507 to the Benzene Stripper Column	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Benzene Stripper Column (5V36)	The cover and all openings (e.g., access hatches, sampling ports, etc) must be monitored initially and annually for NDE.	Completed	61.348(a)(2)	Treatment Processes			X
	Each seal, access door, and all other openings shall be visually inspected initially and quarterly to ensure that no cracks or gaps occur and all openings are closed and gasketed properly.		61.348(e)(1)			X	
Piping from the top of the Benzene Stripper Column (5V36) to the Overhead Condensers (5E41A/B) and to the Overhead Receiver (5V37)	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Benzene Stripper overhead condensers (5E41A/B)	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from the Crude Desalters (5V31/32) to the Benzene Stripper Column (5V36)	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from the Benzene Stripper (5V36) to the Brute Force System	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Brute Force System	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Tank 507	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from the Benzene Stripper Overhead Receiver (5V37) to the Crude Desalters	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
API separator, forebay, and associated equipment	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.347(a)(1)(i)(A)	Oil-Water separators			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly to ensure that no cracks or gaps occur between the cover and oil-water separator wall and that access hatches and other openings are closed and gasketed properly.		61.347(b)			X	
Piping from Gravity Drum near Tank 507 to Slop Tanks 23 and 508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping at Gravity Drum near Tank 507 and piping at Tank 508 used for Vacuum Truck Operations (Gravity Drum near Tank 59 currently out of service).	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Tank 51 to Slop Tank 23/508.	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Tank 51/52	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from Tank 52 to Slop Tanks 23/508.	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from CP Flare Secondary Knockout Drum to CP Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Piping on Hydrocarbon/Liquid Line from CP Sump to FCCU Low Pressure Receiver or Refinery Slop System.	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from CP Flare Knockout Drums to the FCCU High and Low Pressure Slop Header	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from CP Sump to FCCU High and Low Pressure Slop Header	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from FCCU High Pressure Slop Header to High Pressure Slop Bullets	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from FCCU Low Pressure Slop Header to Low Pressure Slop Bullets	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
High and low pressure slop bullets	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Aboveground Sewer Lines from Melvindale or Crude Tank Farms to Tank 507	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Marketing Terminal Sewer to Slop Tanks 23/508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Truck Drain Downs at Terminal Loading Rack	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Aboveground piping from Truck Drain Downs to NESHAP Sump	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Terminal NESHAP Sump	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Tank 29T47	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
All piping To and From 29T47	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Spent Caustic Tank (9V10) to New Caustic Pot (9T29)	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Spent Caustic Pot 9T29	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Tank Cleanouts	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Railcars (when applicable to BWON)	The cover and all openings (e.g., bungs, hatchs, and sampling ports) must be monitored initially and annually for NDE.	Conducted 2nd Quarter 2010	61.345(a)(1)(i)	Containers			X
	Each cover and all openings shall be visually inspected initially and quarterly to ensure that they are closed and gasketed properly.	Completed	61.345(b)	Containers		X	
Frac Tanks (when applicable to BWON)	The cover and all openings (e.g., bungs, hatchs, and sampling ports) must be monitored initially and annually for NDE.	Completed	61.345(a)(1)(i)	Containers			X
	Each cover and all openings shall be visually inspected initially and quarterly to ensure that they are closed and gasketed properly.		61.345(b)	Containers		X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Slop Oil Drums	The cover and all openings (e.g., bungs, hatchs, and sampling ports) must be monitored initially and annually for NDE.	Completed Monthly	61.345(a)(1)(i)	Containers			X
	Each cover and all openings shall be visually inspected initially and quarterly to ensure that they are closed and gasketed properly.		61.345(b)	Containers		X	
All piping to Lab Slop Oil Tank	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Lab Slop Tank	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping at API Separator used for Vacuum Truck Operations	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Piping from Slop Tanks 23/508 to Crude Unit	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially		61.346(a)(2)			X	
Piping from Complex 1 Flare Knockout Drum to the Crude Flare.	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Crude Flare Itself	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from the Propane Caustic Scrubber 9V22 to Alky Spent Caustic Holding Tank 9V31	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Alky Spent Caustic Holding Tank 9V31 used for Vacuum/Tank Trucks Operations	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Unifiner Flare Knockout Drum	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for		61.343(c)			X	
Piping from the Unifiner Flare Knockout Drum to the Unifiner Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Unifiner Flare Itself	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

GOHT Flare Knockout Drum	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for		61.343(c)			X	
Piping from the GOHT Flare Knockout Drum to the Unifiner Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Alky Flare Knockout Drums	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and		61.343(c)			X	
Piping from the Alky Flare Knockout Drums to the Alky Flare	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Alky Flare Itself	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Piping from Caustic Wash Drum (9V10) to Spent Caustic Pot (9T29)	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from SWS Feed Surge Drum to Slop Tanks 23/508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Vacuum Truck Operations at Spent Caustic Tank 21T47	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the CP Primary Flare Knockout Drum 25V1 to the Secondary Knockout Drum 25V2	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Disulfide Separator (21V33 or #3 Merox) to Spent Caustic Tank 21T47	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Caustic Scrubber (12V5) to Slop Tanks 23/508	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Piping from the P.P Caustic Wash Tower (13V1A/B) to Spent Caustic Tank (21T47)	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Spent Caustic Tank 21T47	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from the Debutanizer Ovhd Receiver 14V7/Water KO Pot to Aromatic Sump	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Fuel Gas Coalescers to Aromatic Sump	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from Low/High Pressure Slop Bullets to LPG Knockout Pot 22-1V5	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
LPG Knockout Drum	The cover and all openings (e.g., access hatches, sampling ports, and gauge wells) must be monitored initially and annually for NDE.	Completed	61.343(a)(1)(i)(A)	Tanks			X
	Each fixed-roof, seal, access door, and all other openings shall be visually inspected for indications of cracks, gaps, or other problems that could result in benzene emissions, and that access doors and all other openings are closed and gasketed properly.		61.343(c)			X	
Piping from LPG Knockout Pot to Unifiner Knockout Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Piping from the Terminal NESHAP Sump to VRU or Combustor	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
VRU and Combustor	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	
Fugitive Emissions Eliminator	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Control Devices			X
	Each control device shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for evidence of visible defects.		61.349(f)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Piping from RVP Analyzer Sample to Fugitive Emissions Eliminator	Must be monitored initially and annually for NDE.	Completed	61.349(a)(1)(i)	Closed Vent System			X
	Each closed vent system shall be visually inspected initially and quarterly. Inspection shall include inspection of ductwork, piping, connections to covers and control device for		61.349(f)			X	
Piping from the MVGO Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Piping from the HVGO Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Piping from the LVGO Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Piping from the AGO Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Compressor Lube Oil Filter Changeouts (7C2) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Compressor Lube Oil Filter Changeouts (8V31A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Compressor Lube Oil Filter Changeouts (8V30A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Lube Oil Filter Changeouts (9V45A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Hydraulic Oil Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Slurry Stripper Bottoms Strainer Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Strainer Changeouts (12V47/48) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Lube Oil Filter Changeouts (11V46A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
#6 Gas Lube Oil Filter Changeouts (12V54/55) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Lube Oil Filter Changeouts (12V45A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Lean Amine Filter Changeouts (12V45) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Lean Amine Surge Drum (12V9) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
Trim Compressor Lube Oil Filter Changeouts (13V15) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Trim Compressor Lube Oil Filter Changeouts (13V9) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Lube Oil Filter Changeouts (14ME10A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Lube Oil Filter Changeouts (14ME12A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
Compressor Cylinder Oil Filter Changeouts (14ME18A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	

Table 7
Inspection Certification required under 40 CFR 61.537 (d) (6) Benzene Waste NESHAP - First Quarter 2011
Michigan Refining Division

Compressor Lube Oil Filter Changeouts (14ME17A/B) to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result		61.346(a)(2)			X	
NHT Naphtha Feed Filter Changeouts to Unit Area Slop Drum	The cover and all openings (e.g., access hatches, sampling ports) must be monitored initially and annually for NDE.	Completed	61.346(a)(1)(i)(A)	Individual Drain System			X
	Each cover seal, access hatch, and all other openings shall be visually inspected initially and quarterly thereafter to ensure that no cracks, gaps, or other problems that could result in benzene emissions occur and access hatches and other openings are closed and gasketed properly.		61.346(a)(2)			X	
API Separator Floating Roof Inspections	5 year primary seal, Annual secondary seal.	Completed	61.352(a)(1)	Alternative Standards for Oil-Water separators	2		

Notes:
1. Visual inspections carried out during February 2011.
2. Secondary Seal was inspected during March 2011.

*Method 21 readings for valves are completed quarterly.

Table 8
Exceedance Summary for Various Control Equipment or Treatment Processes
First Quarter 2011
Michigan Refining Division

Equipment	Reporting Requirement	No. of Reportable Exceedances this Quarter	Regulation	Equipment Classification
Desalter Water Flash Column	Each period of operation during which the concentration of benzene is > or = to 10 ppm based upon monthly sampling of Desalter Water Flash Column effluent.	0	40 CFR 61.348(a)(1)(i) & 357(d)(7)(i)	Treatment Processes
Carbon Canisters	Each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified.	4	40 CFR 61.357(d)(7)(iv)(I)	Closed Vent System or Control Device
		0	40 CFR 60.692-5(e)(5)	Closed Vent System or Control Device
Water Draw covers	All water draw covers associated with NESHAP program should be tightly sealed. This includes tanks in the Crude tank farm (6, 36, 39, 40, 41, 45, 46, 47, 48, 49, 53, 61, 72), CP Tank Farm (21, 57), and Melvindale Tank Farm (102, 103, 104, 105, 106, 107, 120, 125, 126, 127, 128, 133, 134, 112, 113, 114, 115, 129, 130, 176, 108, 109, 110, 116)	4	61.349(f)	Closed Vent System
Inspections[1]	Summarizes all inspections required by 61.342 through 61.354 during which detectable emissions are measured or a problem (such as a broken seal, etc.) that could result in benzene emissions, including information about the repairs or corrective action taken.	6	61.357(d)(8)	See Table 7
CP Flare	Each period in which the pilot flame of a flare is absent.	0	40 CFR 61.357(d)(7)(iv)(F)	Closed Vent System or Control Device
Unifiner Flare	Each period in which the pilot flame of a flare is absent.	0	40 CFR 61.357(d)(7)(iv)(F)	Closed Vent System or Control Device
Alkylation Flare	Each period in which the pilot flame of a flare is absent.	0	40 CFR 61.357(d)(7)(iv)(F)	Closed Vent System or Control Device
Crude Flare	Each period in which the pilot flame of a flare is absent.	0	40 CFR 61.357(d)(7)(iv)(F)	Closed Vent System or Control Device
Vapor Recovery Unit	Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone of a thermal vapor incinerator, as measured by the temperature monitoring device is more than 28 °C (50°F) below the design combustion zone temperature.	0	40 CFR 61.357(d)(7)(iv)(A)	Closed Vent System or Control Device
Combustor	Each 3-hour period of operation during which the average temperature of the gas stream in the combustion zone of a boiler or process heater having a design heat input capacity less than 44 MW, as measured by the temperature monitoring device, is more than 28°C (50°F) below the design combustion zone temperature.	0	40 CFR 61.357(d)(7)(iv)(C)	Closed Vent System or Control Device
Fugitive Emissions Eliminator	Each occurrence when the carbon in a carbon adsorber system that is not regenerated directly on site in the control device is not replaced at the predetermined interval specified.	1	40 CFR 61.357(d)(7)(iv)(I)	Closed Vent System or Control Device

Note: 1. Inspections include valves and flanges that had NDE reading above 500 ppm. If deficiencies are noted, an attached summary sheet will be included.

MARATHON - DETROIT
1300 SOUTH FORT STREET
DETROIT, MI 48217

04/20/2011

LEAKING EQUIPMENT LOG

Program: NESHAPS-FF

Reporting Period 01/01/2011 - 03/31/2011

Process Unit : 02

Tag Number	Part / Type	Size	Location	Monitor Date	Test Method	PPM Reading	Part Leaking	Repair Date	Repair Method	Remonitor Reading	Date Completed
22614	VALVE/ ORBIT	3.00	22-P-86 PUMP ORBIT LPG-02-02-02-02-02-02								
				03/07/2011	M21	542 PPM	VLV-PKG	03/07/2011	VLV-TP	561.00	
				03/07/2011	M21	561 PPM		03/11/2011	VLV-TP	22.00	
				03/11/2011	M21	22 PPM					03/11/2011
26204	PUMP/ CENTRIF	0.00	22P86 - LPG SLOP-02								
				01/03/2011	M21	2227 PPM	PMP-SEAL	01/03/2011	PMP-WOW	0.00	
				01/03/2011	VIS	F					
				01/03/2011	M21	2520 PPM		01/04/2011	PMP-STM	5.00	
				01/04/2011	M21	5 PPM					
				01/04/2011	VIS	P					
				01/04/2011	M21	0 PPM					01/04/2011
5-01250	VALVE/ GATE	4.00	22-P-86 PUMP ORBIT LPG-02-02-02-02-02-02								
				03/07/2011	M21	3996 PPM	VLV-PKG	03/07/2011	VLV-TP	1795.00	
				03/07/2011	M21	1795 PPM		03/11/2011	VLV-TP	39.00	
				03/11/2011	M21	39 PPM					03/11/2011
5-01291	VALVE/ ORBIT	4.00	T81 TOP ORBIT								
				03/07/2011	M21	537 PPM	VLV-PKG	03/07/2011	VLV-TP	29900.00	
				03/07/2011	M21	29900 PPM		03/11/2011	VLV-CL	467.00	
				03/11/2011	M21	467 PPM					03/11/2011
5-01332	VALVE/ ORBIT	4.00	T83 BOTTOM ORBIT LPG-02-02								
				03/07/2011	M21	1713 PPM	VLV-PKG	03/07/2011	VLV-TP	1392.00	
				03/07/2011	M21	1392 PPM		03/11/2011	VLV-TP	19.00	
				03/11/2011	M21	19 PPM					03/11/2011

Reporting Period 01/01/2011 - 03/31/2011

Process Unit : 02

Tag Number	Part / Type	Size	Location	Monitor Date	Test Method	PPM Reading	Part Leaking	Repair Date	Repair Method	Remonitor Reading	Date Completed
5-01847	VALVE	3.00	TOP 190 COND LPG								
				03/07/2011	M21	3432 PPM	VLV-PKG	03/07/2011	VLV-TP	622.00	
				03/07/2011	M21	622 PPM		03/11/2011	VLV-TP	114.00	
				03/11/2011	M21	114 PPM					03/11/2011

Process Unit 02 Summary

	Component Count	Leak Count
Total in Group	6	6
Total Valves	5	5
Total Pumps	1	1
Total Compressors	0	0
Total Relief Valves	0	0
Total Connectors	0	0
Total Agitators	0	0
Total Other Equipment	0	0

Table 9
Michigan Refining Division
First Quarter 2011 End of Line Calculations

Q1 2011		S1 Sand Filter Effluent	S2 29T40/41	S3a Centrifuge Solids	S3b 29T12	S7 29T47	S4 Vacuum Truck	S5 Miscellaneous	S6 Spent Caustic	Monthly Total (kg)
January-11	Individual Sample Results (ppm)	0.34	146.67	--	2.50	160.37				
		0.24	180.00	0.88	2.50	230.00				
		0.91	175.00	2	0.025	280.00				
		0.53	--	2.20	2.50	143.33				
	Average Sample Results (ppm)	0.51	167.22	1.69	1.88	203.43				
	Waste Volume (gallons/month)	53,568,000	0	200,740	9,000	20,874				
	Waste Amount (kg)	203,071,418	0	760,987	24,472	78,942				
	Monthly EOL Benzene Quantity (kg)*	**103.06**	**0.00**	**1.29**	**0.05**	**16.06**	**41.40**	**0.38**	**0.00**	**162.24**
February-11	Individual Sample Results (ppm)	0.27	--	2.63	1.00	286.67				
		0.15	306.67	2.17	1.00	290.00				
		0.25	473.33	3.00	0.47	93.67				
		0.38	310.00	0.98	1.74	153.33				
	Average Sample Results (ppm)	0.27	363.33	2.20	1.05	205.92				
	Waste Volume (gallons/month)	48,384,000	13,861	274,440	0	12,462				
	Waste Amount (kg)	183,419,345	52,545	1,040,377	0	47,129				
	Monthly EOL Benzene Quantity (kg)*	**48.76**	**19.09**	**2.28**	**0.00**	**9.70**	**9.32**	**112.00**	**0.05**	**201.21**
March-11	Individual Sample Results (ppm)	0.18	144.67	0.46	0.83	128.33				
		0.26	173.33	1.47	1.00	200.00				
		0.30	196.67	0.37	2.50	117.67				
		0.37	153.33	1.00	2.50	116.67				
		0.33	206.67	3.33	2.75	113.33				
	Average Sample Results (ppm)	0.29	174.93	1.33	1.92	135.20				
	Waste Volume (gallons/month)	53,568,000	23,677	191,360	21,000	7,370				
	Waste Amount (kg)	203,071,418	89,770	725,428	57,102	27,872				
	Monthly EOL Benzene Quantity (kg)*	**58.08**	**15.70**	**0.96**	**0.11**	**3.77**	**212.62**	**0.00**	**0.12**	**291.36**

*For non-detect results, 1/2 the detection limit is used in the calculated quantity.

Quarterly Benzene totals (kg):	209.90	34.79	4.53	0.16	29.53	263.35	112.38	0.17	654.81

First Quarter EOL Benzene Quantity (Mg):	**0.65481**	**First Quarter EOL Benzene Quantity (Kg):**	**654.81**

Table 10
BWON Inspections - First Quarter 2010
Michigan Refining Division

Complex	Unit	Date	Service/Description	First Attempt	Recommended Fix	Final repair	Final Repair Date
5	34	1/11/2011	E Side of Tank 115 Water Draw	Cleaned; Added Water	Clean; Add Water	Cleaned; Added Water	1/12/2011
5	34	1/11/2011	SW Side of Tank 115 Water Draw	Cleaned; Added Water	Clean; Add Water	Cleaned; Added Water	1/12/2011
5	34	1/11/2011	NW Side of Tank 115 Water Draw	Cleaned; Added Water	Clean; Add Water	Cleaned; Added Water	1/12/2011
1	29	1/13/2011	Hatches unlatched	Informed Seal Tech	Latch Hatch	Latched Hatch	1/27/2011
1	29	1/13/2011	Hatch unlatched	Latched Hatches	Latch Hatches	Latched Hatches	1/13/2011
1	29	1/13/2011	API West Cell	Informed Seal Tech	Caulk Leak	Caulked Leak	1/26/2011
1	5	1/26/2011	BWON Used/Slop Oil Drum 1-1	Informed Seal Tech	Secure Lid	Lid Secured	1/27/2011
1	5	1/26/2011	BWON Used/Slop Oil Drum 1-3	Informed Seal Tech	Secure Lid	Lid Secured	2/10/2011
1	7	1/26/2011	BWON Used/Slop Oil Drum M-1	Secure Lid	Secure Lid	Lid Secured	1/26/2011
1	29	2/8/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/9/2011
1	29	2/10/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/14/2011
1	29	2/14/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/15/2011
1	29	2/16/2011	Hatches unlatched	Latched Hatches	Latch Hatches	Latched Hatches	2/16/2011
1	29	2/16/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/16/2011
1	29	2/23/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/23/2011
5	34	2/27/2011	SE Side of Tank 129 Water Draw	Informed Ops	Plug Drain and Riser OOS	Plugged Drain and Riser OOS	2/27/2011
1	29	2/28/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	2/28/2011
1	29	3/1/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	3/3/2011
1	29	3/21/2011	Oil Water Separator	Informed Ops/Seal Tech	Install New Seals; Clean Product on Roof	Installed New Seals; Cleaned Product on Roof	3/28/2011
1	29	3/24/2011	BWON Used/Slop Oil Drum 1-1	Informed Ops	Secure Lid	Secured Lid	4/7/2011
1	29	3/24/2011	BWON Used/Slop Oil Drum 1-3	Informed Ops	Install New Lid	Installed New Lid	4/7/2011
1	29	3/28/2011	Crude Water Draw Sump	Informed Seal Tech	Caulk Leak	Caulked Leak	3/31/2011